

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

In Re: )  
LALONNIE MARIE (GROVES) ) Bankruptcy No. 07-60283-abf7  
                                ) Debtor. )  
LALONNIE MARIE, )  
                                ) Plaintiff, )  
vs. )  
SALLIE MAE, INC., CITIBANK NA, ) Adv. Proc. No. 07-06032-abf7  
EDUCAIDEXTRA PREM LN, ECMC, )  
MOHELA, and LMV FUNDING, )  
EDUCATIONAL CREDIT MANAGEMENT )  
CORP. and CAMPUS PARTNERS, )  
                                ) Defendants. )

**DEFENDANT, MOHELA'S RESPONSE TO THE  
PLAINTIFF'S SECOND AMENDED COMPLAINT**

COMES NOW, MOHELA, by and through its attorneys, and hereby files its responsive pleading in this matter to the Second Amended Complaint by the Debtor filed August 30, 2007, and MOHELA does hereby assert that it denies each and every paragraph, sentence and allegation set forth in the second amended complaint by the Debtor.

1. MOHELA further assets as an affirmative defense that the second amended complaint fails to state a claim for which relief can be granted.

2. Further answering and by way of affirmative defense MOHELA states that the debt in question is one for an educational benefit granted by a governmental unit and was done with respect to Plaintiff's undergraduate degree and that it does not constitute an undue hardship for the Debtor or the Debtor's dependents. No hardship was found in that Debtor has a college degree and has the ability to earn a living and pay for her normal expenses and repay her student loans over time.

WHEREFORE, Defendant, MOHELA asks that the Court after, after reviewing the responsive pleading find that Plaintiff is not entitled to the relief set forth in her complaint to dismiss or deny said complaint and for such other and further relief as the Court deems just in the premises.

LOWTHER JOHNSON, LLC

By: /s/ Lee J. Viorel

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served by electronic notice or by United States Mail, First Class postage prepaid, this 11<sup>th</sup> day of October, 2007, to:

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/s/ Lee J. Viorel  
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